

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

THE UNITED STATES OF AMERICA,

vs

Plaintiff,

D-1 ASIA REID,

Defendant.

Case: 2:21-cr-20213

Assigned To : Cox, Sean F.

Referral Judge: Patti, Anthony P.

Assign. Date : 3/25/2021

Description: INFO USA v. REID (SO)

I N F O R M A T I O N

THE UNITED STATES ATTORNEY CHARGES:

GENERAL ALLEGATIONS

The United States Department of Education administers federal programs that provide money for college eligible students who attend participating post-secondary schools, collectively referred to as Student Financial Assistant (SFA). SFA programs include grants and loans. The United States government provides funds for grants and loan programs.

Students apply for FSA by submitting a Free Application For Federal Student Aid (FAFSA) that contains information that relates to the factors used to determine student's need for FSA. FAFSAs are completed online and are submitted via the internet to the Department of Education Processing Center, located in Plano, Texas. Following review of the application, the processing center electronically transmits the Student Aid Report to the school and student. Upon approval of a grant or loan, the Department of Education authorizes the transfer of funds from the United States Treasury to the school. Funds are transferred electronically via the internet.

The amount of financial aid that a student can receive includes tuition, fees, room and board, books, supplies, and transportation. Often, funds remain after tuition expenses and fees are paid to a school. Institutions provide these funds to the student in the form of a refund check, stored value card, or the electronic transfer of funds to the student's bank or credit union account. These funds can be used by the student for approved, education related expenses.

COUNT ONE
18 U.S.C. §§1343 and 1349 –
Conspiracy To Commit Wire Fraud

D-1 ASIA REID

Beginning in 2015 and continuing through 2016, in the Eastern District of Michigan, defendant ASIA REID and others, both known and unknown, did combine, conspire, confederate and agree to execute and attempt to execute a scheme to defraud the United States Department of Education and to obtain money and property from it by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme to defraud, did transmit and cause to be transmitted by means of wire communications in interstate commerce, writings, signs, signals pictures and sounds.

The object of the conspiracy was to obtain money from the Department of Education for which the recipients were neither eligible nor entitled to receive.

Manner and Means

Conspirators enrolled in on-line classes at local colleges, including the Wayne County Community College District. In certain instances,

conspirators enrolled in on-line classes in the names of other persons, without the knowledge or consent of the individuals whose personal identifying information they used.

Conspirators completed FAFSA applications for federal grants and loans. The applications contained material false information, including the names, addresses, and Social Security numbers of the applicants, information as to financial need, and intended use of the funds. Conspirators submitted the applications via the internet from locations in the Eastern District of Michigan to the Department of Education in Plano, Texas. Once loans and grants were approved, the Department of Education directed the transfer of funds from the United States Treasury to the educational institutions where conspirators had enrolled. After deducting the costs of tuition and fees, schools transferred excess funds to conspirators by issuing cash value cards that were mailed to addresses controlled by conspirators or by electronically transferring funds to bank and credit union accounts controlled by conspirators. Conspirators used these funds for purposes unrelated to educational expenses, contrary to the requirements of the

grants and loans.

It was the role of defendant ASIA REID in the conspiracy to complete and submit online FAFSA applications for conspirators and to assist other conspirators in completing and submitting FAFSA applications that contained material false information. Defendant ASIA REID also received cash value cards in the names of other persons that were sent to her residence by educational institutions and received funds that had been wire transferred into her financial accounts by educational institutions. Defendant ASIA REID shared the proceeds with other conspirators and used proceeds for her own uses that were unrelated to educational expenses, in violation of the terms of the grants and loans.

All in violation of Title 18, United States Code, Sections 1343 and 1349.

COUNT TWO
18 U.S.C. §1028(a)(7) –
Identity Theft

D-1 ASIA REID

On or about November 30, 2020, in the Eastern District of

Michigan, defendant ASIA REID did knowingly possess without lawful authority, the means of identification of other persons with intent to use unlawfully; that is defendant ASIA REID did possess the names, addresses and Social Security numbers of other persons without lawful authority with intent to use the names, addresses and Social Security numbers to commit wire fraud, said offense affecting interstate commerce,

in violation of 18 U.S.C. §1028(a)(7).

FORFEITURE ALLEGATION
**(18 U.S.C. § 981(a)(1)(C), § 982(a)(2)(B),
§ 1028(b)(5), 28 U.S.C. § 2461(c))**

The allegations contained in Counts One and Two of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b)(5).

Upon conviction of the offense in violation of Title 18, United States Code, Section 1343 set forth in Count One of this Information,

the defendant, ASIA REID, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

Upon conviction of the offense in violation of Title 18, United States Code, Section 1028 set forth in Count Two of this Information, the defendant, ASIA REID, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and pursuant to Title 18, United States Code, Section 1028(b)(5), any personal property used or intended to be used to commit the offense.

The property to be forfeited includes, but is not limited to the following: a Rolex watch (21-USP-000865), \$102.00 in U.S. Currency (21-USP-000958), a Louis Vuitton purse, Canada Goose Jacket and hat (21-USP-000959). In addition, as part of the forfeiture in this case, the United States intends to seek a forfeiture money judgment.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as

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incorporated by Title 18, United States Code, Sections 982(b)(1), 1028(g) and Title 28, United States Code, Section 2461(c).

Respectfully submitted,

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